

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ELIZABETH FLINT,

Plaintiff,

23-CV-86 (PGG) (KHP)

-against-

ORDER

1515 BROADWAY OWNER LP and  
BROADWAY SRJ, LLC,

Defendants.  
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**KATHARINE H. PARKER, United States Magistrate Judge:**

On Tuesday, June 27, 2023, the parties appeared for an Initial Case Management Conference. After review of the pleadings and consultation with the parties, the following Scheduling Order is entered pursuant to Rule 16 of the Federal Rules of Civil Procedure:

**Pleadings, Parties, and Motions.** The parties shall have until **30 days after Plaintiff serves her expert report on Defendant** to amend the pleadings. The parties shall have until **September 27, 2023** to join parties. No further amendments or joinder of parties thereafter will be permitted absent good cause.

**Discovery.** The deadline to complete fact discovery is **October 27, 2023**. The deadline to complete expert discovery is **December 27, 2023**. Defendant shall conduct a formal inspection of the premises by **Monday, July 31, 2023**.

**Interim Discovery Deadlines.** Initial interrogatories and requests for production are due by July 27, 2023. Requests for admission are due by September 12, 2023. Depositions shall be completed by October 6, 2023 and limited to 3 per party. The parties may agree to move these interim deadlines without seeking leave of the Court.

**Discovery Disputes.** The parties shall follow the Court's Individual Procedures with respect to any discovery disputes. See <https://nysd.uscourts.gov/hon-katharine-h-parker>.


**Rule 1 and Rule 26(b)(1).** Counsel shall comply with Rule 1 and Rule 26(b)(1) in the conduct of discovery.

**Document Requests.** Counsel shall be fully familiar with their obligations under Rules 34 and 26(g) and consider and discuss ways to ensure compliance and minimize disputes regarding overbreadth and specificity of requests and responses. A failure to comply with this responsibility carries serious consequences. Requests for any and all documents on a broad topic are presumptively improper. Likewise, courts have held that an objection that does not appropriately explain its grounds is forfeited. *See, e.g., Fischer v. Forrest*, 2017 WL 773694 (S.D.N.Y. Feb. 28, 2017) (“[A]ny discovery response that does not comply with Rule 34’s requirement to state objections with specificity (and to clearly indicate whether responsive material is being withheld on the basis of objection) will be deemed a waiver of all objections (except as to privilege).”).

**Status Letter.** The parties shall file a joint status letter on **Thursday, August 10, 2023** updating the Court on the status of discovery.

**SO ORDERED.**

DATED: New York, New York  
June 27, 2023

  
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KATHARINE H. PARKER  
United States Magistrate Judge